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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 13, 2020

ASE Adi to June 24, 2020

At 2:30 - time Excluded interest

At 2:30 - time Excluded

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Re:

500 Pearl Street New York, NY 10007

BY ECF

United States v. Jonathan Skolnick, 19 Cr. 730 (CM)

Dear Judge McMahon:

The Honorable Colleen McMahon United States Chief District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse

The parties in the above captioned matter respectfully request that the conference scheduled for April 22, 2020, at 2:15 p.m. be adjourned at least 60 days. The adjournment would allow the Government to provide defense counsel with time to conduct an onsite review of additional discovery material that cannot be produced because of the Adam Walsh Child Protection and Safety Act. See 18 U.S.C. § 3509(m). This review has been delayed because of the COVID-19 pandemic.

The Government respectfully requests that time be excluded under the Speedy Trial Act between April 22, 2020, through the next-scheduled conference because the "ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7)(A). The Government consulted with defense counsel, who does not object to the exclusion of time.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

/s/ Rebecca T. Dell

Elizabeth A. Espinosa/Rebecca T. Dell Assistant United States Attorneys (212) 637-2216/-2198

cc: Avraham C. Moskowitz, Esq. (By ECF)